



Re: FCC Proceeding 12-354

This letter is to voice our opposition to the proposals made by T-Mobile and CTIA regarding the CBRS band.

Softcom Internet Communications, Inc. is a Wireless Internet Service provider operating in the Central Valley of California serving approximately 4,000 customers. We offer download speeds of up to 50 mbps. Our coverage area is predominantly rural, and we focus on bringing the best possible service to areas that incumbent providers refuse to service.

Since 2011, we have invested significantly in equipment which provides service to our customers in the 3650-3700 band. We have recently begun investing in LTE equipment in the past two years, with the strong belief that the several years of time that the FCC took in working with all the appropriate stakeholders (including the Wireless Internet Service Provider Association) in the rulemaking process for the CBRS band would open up additional spectrum to WISPs such as ours. We also were thankful for the grandfathered protection included in the rules which allows us to continue to offer service to our customers using our investment in the 3650-3700 band equipment until we are able to replace it with CBRS compliant equipment.

To hear that one of the largest mobile carriers in the country and the lobbying organization of the mobile carriers have filed last second petitions in an effort to fundamentally alter the CBRS rules in their favor is distressing, to say the least.

Despite their claims to the contrary, the large mobile carriers are very anti-consumer, and their coordinated attack on the CBRS rules will drive many WISPs – most of whom are small businesses -- out of business. Communities who lack affordable broadband service (or any broadband service whatsoever) will continue to be mired in the digital divide; consumer choice will be stifled, and prices will continue to rise.

Over the years, the FCC has made enhancements to the minimum speeds required for service to be classified as broadband, and this is a very challenging goal to continuously meet. WISPs such as Softcom are ready and willing to meet the task. Many WISPs are counting on the CBRS rules to protect their existing 3650-3700 gear and the additional spectrum to help them meet the goals that the FCC has laid out; these proposed rule changes by T-Mobile and CTIA is effectively telling rural citizens that they don't deserve quality broadband service at an affordable price. The FCC should not give in to the efforts to control even more spectrum by a multibillion dollar company and the lobbying arm of a group of multibillion dollar companies.

For these reasons, Softcom Internet Communications, Inc. strongly oppose the petitions filed by T-Mobile and the CTIA regarding changes to the CBRS band.

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